UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

MARIE JOSEPH,)	Case No.: 1:16-CV-00465-TSB
	Plaintiff,)	Judge Timothy S. Black
v.)	DEFENDANT RONALD JOSEPH'S
RONALD JOSEPH, et al.,)	UNOPPOSED MOTION TO EXTEND ANSWER DATE FOR
	Defendants)	AMENDED COMPLAINT
	Defendants.)	

Defendant Ronald Joseph ("Defendant") moves for an Order extending his date to respond to Plaintiff's First Amended Complaint until February 7, 2017. Plaintiff's counsel have already advised that they do not oppose this extension. On January 10, 2017, the Court granted Plaintiff's Motion for Leave to Amend the Complaint, and Plaintiff filed her First Amended Complaint later that same day. Under Federal Rule 15(a)(3), Defendant's response to the First Amended Complaint is due on January 24, 2017. By this Motion, Defendant seeks a two-week extension.

The proposed two-week extension will not delay this case. The First Amended Complaint adds four new parties who have not yet been served and whose deadline to respond will necessarily be after February 7, 2017. Accordingly, Defendant respectfully requests that the Court grant his Motion and extend his answer date to February 7, 2017.

Respectfully submitted,

/s/ Stephen R. Hernick

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Trial Attorneys for Defendant Ronald Joseph Case: 1:16-cv-00465-TSB Doc #: 30 Filed: 01/18/17 Page: 3 of 3 PAGEID #: 262

CERTIFICATE OF SERVICE

I certify that on January 18, 2017, I filed Defendant Ronald Joseph's Unopposed Motion

to Extend Answer Date to Amended Complaint with the Clerk of Court using the CM/ECF

system, which will send notice to all counsel of record.

/s/ Stephen R. Hernick

Stephen R. Hernick

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